

Safety Evaluation Report Language:

### 3.0 DESCRIPTION OF PROPOSED FACILITY

#### 3.1 IN SITU RECOVERY (ISR) PROCESS AND EQUIPMENT

##### 3.1.3.7 Schedule

The applicant's schedule for the production, decommissioning, and restoration phases for all proposed wellfields indicates the applicant intends to extract uranium from each wellfield for 1 to 1.5 years. The NRC notes in the April 2014 Safety Evaluation Report that Powertech anticipates that the groundwater restoration phase will require 0.25 to 0.5 years to complete. The NRC stated that restoration typically requires years; therefore, the applicant's restoration schedule is very optimistic and determined that the groundwater restoration schedule is not reasonable given the period of time that has been needed to restore other wellfields at different licensed ISR facilities.

The uncertainty in the time for groundwater restoration

##### 6.1.3.6 Restoration Stabilization Monitoring the SER states that

If the applicant identifies hot spots, it will conduct additional evaluations, such as collecting additional water samples, analysis of additional parameters, trend analyses, or flow and transport modeling. Based on the results of the evaluation, the applicant may perform additional stability monitoring or restoration. The applicant states that if it sufficiently demonstrates that hot spots will not affect water quality outside of the exempted aquifer and the restoration criteria are otherwise met without increasing trends, then no additional action will be taken.

Second, the applicant cannot remove wellfield infrastructure necessary for groundwater restoration until the NRC staff approves the restoration. If necessary infrastructure is removed prematurely, the applicant must either replace the equipment or include the cost for replacing the equipment in its financial assurance estimate.